

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MILDRED FIGUERAS FIGUEROA

Debtor(s)

CASE NUMBER: 09-02380 SEK

CHAPTER 13 (ASSET CASE)

**DEBTORS REPLY TO FIRSTBANK PUERTO RICO
MOTION FOR RELIEF OF STAY UNDER 362**

TO THE HONORABLE COURT:

COMES now Debtor(s)represented by the undersigned counsel and respectfully Allege(s) and Pray(s) as follows:

1. That on March 14th, 2011, the creditor Firstbank Puerto Rico filed a Motion for Relief From Stay Under 362 based on the fact that debtor was in arrears in the first mortgage loan in the amount of \$1,248.76.
2. Debtor made two of the five payments in arrears and will be cure the remaining three payments through a Post Confirmation Modification, debtor will include the current month of March in the plan.
3. Based on the abovementioned, it is debtor's contention that Firstbank Puerto Rico motion turns into a moot one.

WHEREFORE, it is respectfully requested from this Honorable Court to GRANT the present Motion, therefore deny Firstbank Puerto Rico Motion for Relief of Stay under 362.

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DEBTORS REPLY TO FIRSTBANK PUERTO RICO
MOTION FOR RELIEF OF STAY UNDER 362**

In San Juan, Puerto Rico, this 22nd, day of March, 2011.

RESPECTFULLY SUBMITTED

**/S/Marilyn Valdes Ortega
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Case No. 09-02380 SEK

I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

09-02380 SEK Notice will be electronically mailed to:

JOSE RAMON CARRION MORALES
newecfmail@ch13-pr.com

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I HEREBY CERTIFY: That I have mailed by regular mail to all creditors listed.

09-02380 SEK Notice will not be electronically mailed to:

FIA CARD SERVICES PO BOX 15726 WILMINGTON, DE 19886-5726	Recovery Management Systems Corporation For GE Money Bank dba SAM'S CLUB 25 SE 2nd Ave Ste 1120 Miami FL 33131-1605	(p) INTERNAL REVENUE SERVICE CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346 PHILADELPHIA PA 19101-7346	FIA CARD SERVICES, N.A. ATTN. MR. BK 1000 Samoset Drive 335-023-03-03 Newark, DE 19713-6000
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SAM'S CLUB PO BOX 530942 ATLANTA, GA 30353-0942	SANTANDER FINANCIAL SERVICES, INC. CALLE LOIZA 1863 SAN JUAN, PR 00911-1862	DEPARTAMENTO DEL TRABAJO AVE. MUOZ RIVERA 505 HATO REY, PR 00918-3352	SEARS CREDIT CARDS P.O. BOX 183081 COLUMBUS, OH 43218-3081
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PR ACQUISITIONS LLC
250 MUÑOZ RIVERA AVENUE SUITE 1200
HATO REY, P.R 00918-1814

PR ACQUISITIONS LLC AMERICAN INTL BUILDING 250 MUÑOZ RIVERA AVENUE SUITE 1200 HATO REY, PR 00918-1814	CitiFinancial, Inc. P.O. Box 70919 Charlotte, NC 28272-0919	DEPARTAMENTO DE HACIENDA PO BOX 9024140 OFICINA 424 B SAN JUAN, PR 00902-4140
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PR RECEIVABLES MANAGEMENT LLC AS AGENT OF P
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SANTANDER FINANCIAL SERVICE D/B/A ISLAND FIN C/O LIGIA RIVERA BUJOSA PO BOX 7011 PONCE PR 00732-7011	CITIFINANCIAL PO BOX 71328 SAN JUAN, PR 00936-8428	CITIFINANCIAL ONE CITIBANK DRIVE SUITE 201 SAN JUAN, PR 00926-9600
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